

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NHAN LUONG,

Plaintiff,

V.

**TRANS UNION, LLC;
EXPERIAN INFORMATION
SOLUTIONS, INC.; EQUIFAX
INFORMATION SERVICES,
LLC; BANK OF AMERICA
CORPORATION;**

Defendants.

STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT BANK OF AMERICA N.A. TO RESPOND TO PLAINTIFF'S COMPLAINT

NOW COMES Plaintiff Nhan Luong (“Plaintiff”) and Defendant Bank of America, N.A. (“BANA”), incorrectly named in the Complaint as Bank of America Corporation, by and through their attorneys, consent to an Order of the Court extending BANA’s time to answer or otherwise respond to the Complaint up to and including February 2, 2024, and that any such responsive pleading filed on or before that date shall be deemed timely filed.

1. The Complaint and Summons in the above-captioned matter were served on BANA on or about December 12, 2023. Pursuant to Federal Rules of Civil Procedure, BANA's response to Plaintiff's Complaint is currently due on January 2, 2024.

2. Good cause exists because counsel for BANA just was recently retained, and counsel needs additional time to review the case materials to file the appropriate response to Plaintiff's Complaint.

3. BANA's counsel has conferred with Plaintiff's counsel regarding the relief sought in this Stipulation, and Plaintiff's counsel does not oppose.

4. Finally, the granting of this Stipulation will not prejudice any party or impact the trial date as no trial date has been set.

WHEREFORE, Plaintiff and BANA Stipulate to an Order of the Court extending BANA's time to answer or otherwise respond to the Complaint up to and including February 2, 2024.

DATE: December 22, 2023

/s/ Brent F. Vullings (with consent)

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**ATTORNEYS FOR BANK OF AMERICA,
N.A.**

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CIVIL ACTION NO. 2:23-cv-04761-MAK

[PROPOSED] ORDER

For good cause appearing, it is therefore ordered that on this _____ day of _____, 2023, Defendant Bank of America N.A., shall have up to and including **February 2, 2024**, to answer or otherwise respond to Plaintiff's Complaint.

Honorable Mark A. Kearney